

UTILITY BILL AUDITING

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FCC MAIL ROOM

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, DC 20554

Re: Policy and Rules Concerning the Interstate, Interexchange Marketplace, CC Docket No. 96-61

Dear Mr. Caton:

I am writing to express concern about the FCC's proposal to eliminate the tariff filing requirements for interstate, interexchange carriers in the proceeding referenced above. AUDITS UNLIMITED is a small company specializing in the auditing of local and long distance telephone bills for other businesses. Our compensation is in the form of shared refunds from the telephone companies. AUDITS UNLIMITED has depended upon the information previously available in public tariff filings to determine whether our clients are being correctly billed by the telephone companies. Without such information it will be impossible for us to continue doing this.

Furthermore, there will be no way for a business such as ours to compare competitive offerings and recommend the best service for our clients. Without public access to the rates, communications providers will be able to offer the cheapest rates to whomever they choose. All we ask for is a level playing field.

Although the FCC proposes to eliminate the tariff filing requirements for interstate, interexchange carrier, the FCC tentatively recommends that interexchange telephone companies be required to maintain pricing information for use by the FCC upon request. I strongly urge the FCC to require that such information also be available to the public upon request. This could be done cheaply, efficiently, and with a minimum of administrative burden to either the FCC or the interexchange carriers. The possible mechanisms for the provision of such information could include some sore of central clearinghouse, on-availability, or physical availability at designated carrier locations.

Such information will enable informed decision making by consumers... particularly small businesses that do not have the

No. of Copies rec'd Odll List ABCDE resources to obtain this information absent a public availability requirement. This information will also more readily enable consumers to determine if interexchange carriers are pricing in a non-discriminatory manner. Even if the tariff filing requirement is eliminated, other provisions of the Communications Act require that carriers provide service in a non-discriminatory manner. Absent some mechanism for customers to determine carriers' pricing, however, it is hard to tell if carriers are complying with this statutory requirement.

In a robustly competitive market such as that for interstate, interexchange telecommunications services, the availability of pricing information will only further foster that competitiveness. For example, pricing information could assist resellers in determining the financial feasibility of market entry, which can further increase the competitiveness of the market. By extension, it will increase the competitiveness of small businesses that are able to readily minimize their communications costs. I, therefore strongly urge the FCC to require interexchange telephone companies to make their pricing information available to the public in some fashion.

Sincerely,

Eileen Seidowitz

President